

Hearing Date: December 19, 2022
Hearing Time: 10:00 a.m.,

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10964 (MG)

Jointly Administered

**PARTIAL JOINDER AND RESPONSE OF THE AD HOC GROUP
OF BORROWERS IN THE MOTION FOR THE ENTRY OF AN ORDER (I)
APPOINTING A CHAPTER ELEVEN MEDIATOR (II) DIRECTING MANDATORY
MEDIATION AND (III) GRANTING RELATED RELIEF [DOC. NO. 1630]**

The ad hoc Group of Borrowers (collectively, the “Borrowers”)², by and through their counsel, McCarter & English, LLP, hereby file this partial joinder and response to the Motion For The Entry Of An Order (I) Appointing A Chapter Eleven Mediator (II) Directing Mandatory Mediation And (III) Granting Related Relief [Doc. No. 1630] (the “Mediation Motion”) and respectfully state as follows:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC’s principal place of business is 121 River Street, PH05, Hoboken, New Jersey 07030.

². The Borrowers consist of persons who deposited their cryptocurrency as collateral against loans provided by Celsius Lending, LLC.

PARTIAL JOINDER

The ad hoc Group of Borrowers join in the Mediation Motion. While other parties have raised objections to the scope of the mediation, the ad hoc Group of Borrowers believe that the subject matter of the mediation should include, at a minimum, plan related issues between Earn and the borrowers, the two largest creditor constituencies in this bankruptcy case.

WHEREFORE, the Borrowers respectfully requests that the Court enter an appropriate order granting the Mediation Motion.

Dated: New York, New York
December 19, 2022

McCARTER & ENGLISH, LLP

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